

1 Q Do you know what -- do you know whether she holds  
2 any offices in TBN?

3 A Not that I know of.

4 Q Did you -- did there ever come a time that you  
5 learned that a board member of NMTV was going to resign?

6 A There was talk about that in several radio talk  
7 shows or rather his problems, and then a Christian magazine  
8 that I read talked about his relationship to NMTV and that he  
9 might have to step aside.

10 Q Who is he then?

11 A Phil Aguilar.

12 Q And when did you hear of this for the first time?

13 A The problems, gee, probably a year and a half ago.  
14 And then the subsequently the magazine, there has been several  
15 articles.

16 Q Did Mrs. Duff or Dr. Crouch ever talk with you at  
17 any time about pastor, about the possibility of Pastor Aguilar  
18 resigning?

19 A No. I brought the issue to Mrs. Jane Duff.

20 Q Tell me about that.

21 A Since it was public knowledge, and we had gone out  
22 to lunch, I said, you know, what's happening? And I noticed a  
23 big reluctance to even talk about the issue. I did not know  
24 why. But she just said let's pray for him. You know, like  
25 everybody goes through their troubles and tribulations. So

1 that was that.

2 Q Did she answer your question?

3 A No. She was very evasive. Now I can understand  
4 why.

5 Q Why do you say that?

6 A Well, he was a controversial person with NMTV and  
7 then now this proceeding here.

8 Q Did she ever, did she ever give you any, any  
9 understanding or information as to, as to what his problem,  
10 Pastor Aguilar's problems were?

11 A No. I knew very well at least the allegations from  
12 the radio programs and the magazines.

13 Q And you say she was evasive. Those are your words.

14 A Yes. You know I, I wanted to know I mean whether  
15 there were substantial things or not. Just curious basically.

16 Q And she wouldn't be responsive?

17 A Right. Yeah. She would not -- she just said let's  
18 pray for him. Yeah, you know, people say this and the other.  
19 And allegations are thrown at just about anybody, the  
20 president, pastors, evangelists, whoever.

21 Q Was this the meeting that -- was this the meeting  
22 you had with Mrs. Duff where she asked you to, to join NMTV?

23 A No.

24 Q This was another meeting.

25 A Yes.

1 Q It was before she asked you to join NMTV?  
2 A Pardon me?  
3 Q The meeting that you've just been testifying about,  
4 the lunch.  
5 A Yeah.  
6 Q Was this before she asked you to join NMTV?  
7 A Yes.  
8 Q Now you joined NMTV in April of -- April 20, 1993.  
9 A Um-hum.  
10 Q Okay. Give me your best recollection of when did  
11 you have the lunch with Mrs. Duff that you've just testified  
12 about?  
13 A Oh, gee. It's hard to --  
14 Q Was it a month or so before April 20, 1993?  
15 A Oh, probably a couple of months before.  
16 Q And what was the reason you had lunch together?  
17 A To talk about our account.  
18 Q Your program.  
19 A Yes.  
20 Q Now is Mrs. Duff your liaison, your TBN liaison on  
21 the program Our Town?  
22 A Yes.  
23 Q And what role does she perform in connection with  
24 Our Town?  
25 A I actually report directly to the public affairs

1 director.

2 Q Who is that?

3 A That is Dixie West.

4 Q Yes.

5 A Who in turn is accountable to Mrs. Jane Duff. So  
6 like she would be --

7 Q The boss's boss, huh?

8 A Right. So we were talking about things that we need  
9 to cover on Our Town. Programming matters. And then I  
10 brought the issue, because I had read this in the Christian  
11 magazines.

12 Q I understand. Now was it through Mrs. Duff that,  
13 that the program, your program, Our Town, began being  
14 broadcast?

15 A She invited me. She, she said if I would be  
16 interested in doing it. And --

17 Q She, she was the one that, that you've been, that  
18 you dealt with in terms of bringing the program on board. Is  
19 that it?

20 A Yes.

21 Q And just for my own curiosity, I'm sure it's in your  
22 exhibit, but we can move quicker. Tell me when, when Our Town  
23 began being broadcast.

24 A About -- I think it may be close to -- gee, it's  
25 probably been a year and a half ago.

1 Q Must say I'm bad here.

2 A Perhaps --

3 Q Was it before April of '93?

4 A Oh, yes. Way, way --

5 Q Yes. It was like the beginning of April? I mean

6 beginning of the year, beginning --

7 A Something like that.

8 Q Around early 1993?

9 A Yes. I mean give or take -- I'm sorry I cannot --

10 Q I understand. Now at the meeting, at the luncheon

11 meeting, you had the, you mentioned to me about the reference

12 to Pastor Aguilar. At that luncheon meeting was, was there

13 anything said about you joining the board of NMTV?

14 A No.

15 Q So it's my understanding then Mrs. Duff approached

16 you later to join.

17 A Yes. Yes. Close to the April meeting.

18 Q Now you will recall at your deposition on

19 September 21 that you believed, didn't you, when you were

20 first asked that Paul Crouch, Jane Duff and Terry Hickey and

21 Alan Brown were the directors of NMTV. You recall that

22 testimony.

23 A Yes.

24 Q And then do you recall that we had a recess. And

25 you --

1 A Right.

2 Q -- will recall that you had an opportunity to speak  
3 with your counsel. Do you recall?

4 A That's correct.

5 Q And then you will recall that you corrected your  
6 testimony. Is that, is that accurate?

7 A That is accurate.

8 Q And have I stated that, the sequence accurately?

9 A Yes, sir. I did mix the officers, officers and  
10 directors.

11 Q What's your understanding today of who are the  
12 officers as you speak, as you sit here? Who are the officers  
13 of NMTV?

14 A The president is Dr. Paul F. Crouch. The secretary  
15 is Mrs. Jane Duff. Mr. Terry Hickey, assistant secretary.  
16 And Mr. Alan Brown, assistant secretary.

17 COURT REPORTER: Excuse me. I'd like to change the  
18 tape.

19 JUDGE CHACHKIN: Yes.

20 (Off the record at 10:55 a.m. Back on the record at  
21 11:10 a.m.)

22 JUDGE CHACHKIN: On the record, Mr. Cohen.

23 MR. COHEN: Thank you, Your Honor.

24 BY MR. COHEN:

25 Q Before I forget, I had a question about your program

1 "Se Habla Ingles" is, which is carried on the Community,  
2 Community Educational Television station in Houston. Is Mrs.  
3 Duff the person you, who is your liaison with reference to  
4 that program?

5 A Yes. Her and I also spoke with Mr. Terry Hickey. I  
6 had conversations with him too. But my liaison mainly has  
7 been Mrs. Jane Duff.

8 Q Do, do you have any knowledge, sir, as to what her  
9 responsibilities are concerning that Educational Television  
10 station?

11 A I don't, sir.

12 Q Did you bring the, the, to her attention the fact  
13 that you had created this program?

14 A Yes. Well, I was approached to, to do this program.

15 Q Who approached you?

16 A Both Mrs. Duff and Terry Hickey in my  
17 conversation --

18 Q How did they learn of the fact that, that the  
19 program existed?

20 A No, they asked me to produce it and host it.

21 Q Oh, I see. It was their idea. You mean they, they  
22 suggested to you that you produce this program.

23 A Yes. There was a need for this type of program.

24 Q Oh, I see. I didn't realize that. Oh. So the, the  
25 idea came from Mrs. Duff and Mr. Hickey.

1           A     Or someone else. But they conveyed it that. And I  
2 had, you know, I have always had an interest in this kind of  
3 bilingual type of program.

4           Q     I see. That's, that's helpful, and I thank you for  
5 that. Turning back to where we were when, when the judge  
6 ordered a recess, I had asked you about who the officers of  
7 the corporation were. And you told me. And I don't see any  
8 reference in what you told me to a treasurer or a chief  
9 financial officer. Does anybody serve in that capacity?

10          A     Yes, Mrs. Jane Duff.

11          Q     And, and does she have a title to your knowledge?

12          A     I think she's the chief operating officer.

13          Q     The chief operating officer.

14          A     Yes, I believe so.

15          Q     Is that, is that memorialized in any document to  
16 your knowledge?

17          A     No, I cannot pinpoint any document to that effect.

18          Q     Are you an officer?

19          A     I thought I was. There was a little confusion since  
20 I was replacing I thought Mr. Phil Aquilar who was a vice  
21 president.

22          Q     Yes.

23          A     I gathered I was, I was elected to that. But there  
24 is no official record that I was elected vice president.

25          Q     Well, let me help you, sir. I, I think, I think



1 | there is a record which I'd like to show you. And this  
2 | will --

3 |           MR. COHEN: Your Honor, this has been shown to, in  
4 | the hearing before. This is not in evidence. But Mr. Topel  
5 | is aware of it. It's an amendment -- it's, it's a filing, an  
6 | informational filing filed on May 10, 1993 with the Commission  
7 | which --

8 |           MR. TOPEL: Do you have an extra copy? Just let me  
9 | look at --

10 |           MR. COHEN: Sure. I, I wanted to share with the --  
11 | yeah. I'll look over the judge's and witness's shoulders. Is  
12 | it all right if I look over the witness's shoulder?

13 |           JUDGE CHACHKIN: Go ahead.

14 |           BY MR. COHEN:

15 |           Q     I want to show you something, Mr. Ramirez. It's  
16 | been admitted. You can close that up now. You needn't burden  
17 | yourself with that. And you can close that up too.

18 |           A     Okay.

19 |           Q     If you keep everything open, you'll never be able to  
20 | see over the pile.

21 |           A     Right.

22 |           Q     You can close that too. I want to show you a  
23 | document which was filed with the Commission which reflects  
24 | that you were elected as vice president and director. And  
25 | spend a minute and look at that.

1 (Pause.)

2 Q Tell me when you've read that.

3 A Yes, I have.

4 Q You see that, that document reflects that you, you

5 were elected as a director and an officer --

6 A Yes. The minutes of April 20th --

7 Q Well, I'm going to get to that next. You're,

8 you've --

9 A Yeah. So this is why --

10 Q You've anticipated me. I want, I want next to get

11 to the minutes. Look at Bureau Exhibit 412.

12 MR. TOPEL: That's going to be in volume 7.

13 (Pause.)

14 MR. COHEN: Bureau 412. Let me help you find it.

15 It's confusing unless you -- by the time you leave you'll be

16 an expert.

17 DR. RAMIREZ: Yeah.

18 MR. COHEN: Well, let's see. You're, you're at

19 the -- you need to get to -- what volume is that?

20 MR. TOPEL: Seven.

21 BY MR. COHEN:

22 Q That's the meeting that you were referring to.

23 A Yes.

24 Q And, and you're quite right. I, I wanted to bring

25 that to your attention. The minutes of that meeting state

1 that you were elected to the board of directors. But they  
2 don't state that you were vice president.

3 A I assumed that because --

4 Q Okay. My, my question is do you have any, any  
5 knowledge or any understanding as to why the minutes were not  
6 corrected to reflect the fact that you were elected vice  
7 president?

8 A No, sir.

9 Q But do you -- but were you -- you were present at  
10 the meeting. Were you elected vice president at the meeting?

11 A Again by -- in my mind and by virtue of the fact  
12 that I was replacing Mr. Aquilar, Reverend Aquilar, I assumed  
13 that that's what it was. That that came with the package.

14 Q Let me borrow this document back. Is this, is this  
15 the very first time that you've seen the document dated  
16 May 10, 1993?

17 A No. I did receive a copy of the document.

18 Q So you knew from that document then that it  
19 stated --

20 A Yes. And I assume that this motion here also  
21 included me becoming vice president.

22 Q Have you ever asked Mrs. Duff or anyone else to  
23 correct the April 20, 1993 minutes?

24 A No.

25 Q Okay. In your mind, are you the, are you a -- are

1 you the vice president of NMTV?

2 A Well, yes, according to that document, yes.

3 Q Do you consider --

4 A Which comes from my lawyer.

5 Q Do you consider yourself the vice president?

6 A Yes, sir.

7 Q What have you done as vice president?

8 A Not much so far. I've only been to two meetings.

9 But I do intend to do as much as I can.

10 Q Well, it's accurate then that, that you haven't  
11 discharged any responsibilities as vice president --

12 A Not yet, sir.

13 Q Now you stated you've been to two meetings. Okay.

14 A Yes.

15 Q Can you give me your best recollection is one of  
16 those two meetings the April 20, 1993 meeting?

17 A Yes, sir.

18 Q Okay. Can you give me your best recollection as to  
19 when the, the next meeting occurred?

20 A Oh, probably about a month later or something like  
21 that.

22 Q And, and what was the, what was the, discussed at,  
23 the purpose of that meeting?

24 A To make a decision in terms of the client-lawyer  
25 relationship and joint representation.

1 Q And that -- your best recollection, that meeting  
2 occurred in the summer then of, of 1993?

3 A Yes. Shortly after. Not too many weeks after  
4 April.

5 Q Sometime in, in June or July, May, June or July?

6 A Something like that.

7 Q And there's been no meetings subsequent to that.

8 A No, sir.

9 Q Now in your review of the papers that Mrs. Duff made  
10 available to you, did you become aware of the fact that  
11 commencing in 1981 or 1982 NMTV elected officers and directors  
12 in January of each year?

13 A No, I did not --

14 Q You can accept that as a fact. I, I would not  
15 mislead you. And Mr. Topel --

16 A Oh, no. Yes.

17 Q -- wouldn't let me mislead you. But that's a fact.  
18 Okay. Is, is that the first time that you, that you're aware  
19 that NMTV has had the practice up until, well, starting in  
20 1982 I think of electing officers and directors in January of  
21 each year?

22 A If this is the first time I'm, I'm aware?

23 Q Yeah. Is this the first time you're aware of that?

24 A Yes. Consciously, yes. I, I vaguely remember  
25 reading something to that effect. But I need to get better

1 acquainted with everything.

2 Q Well, do you have knowledge as to when the last  
3 officers of, officers of NMTV were elected apart from  
4 yourself?

5 A No, sir, I cannot tell you when.

6 Q I'm talking about Paul Crouch as president and Jane  
7 Duff as secretary and Terry Hickey as assistant secretary and  
8 Alan Brown as assistant secretary.

9 A I'm sorry, I don't. I don't know.

10 Q And no one, neither Mrs. Duff or Paul Crouch have  
11 discussed the matter with you of, of electing new officers and  
12 directors for NMTV.

13 A Not yet.

14 Q And no meeting is scheduled to your knowledge for  
15 the, for the purposes of electing officers and directors for  
16 1994. Am I correct?

17 A No, we have not set a date for that purpose.

18 Q Have you set a date for any meeting of NMTV in 1994?

19 A Yes, sir. Is tentative dates.

20 Q And when is that?

21 A Probably next month.

22 Q And what's the purpose of that meeting if you know?

23 A I know that one of the reasons to come together and  
24 see what is happening as the result of these proceedings, and  
25 probably at that time we may talk about officers. I do not

1 know.

2 (Pause.)

3 DR. RAMIREZ: Can I add to my answer, or is that not  
4 permitted?

5 MR. COHEN: Well, no. If you have something else to  
6 say about this subject, I want to give you every opportunity.

7 DR. RAMIREZ: Yes. We do -- although we have not  
8 pinpointed the date of our next meeting, we do want to do it  
9 shortly after the hearings to see in what ways we can improve  
10 our performance and to function better.

11 BY MR. COHEN:

12 Q And who told you that?

13 A Well, that's something that I desire. And I know  
14 the, our lawyers would like us to look at things that could be  
15 improved. And certainly as, as part of the board most  
16 certainly I want to know what are the lessons to be learned  
17 from this process.

18 Q That's very interesting. Thank you. Which raises a  
19 question. I want to ask you to, to focus if you will on the  
20 April 20, 1993 minutes which you have before you. That's,  
21 that's --

22 A Yes.

23 Q Do you have those?

24 A Yes, I --

25 Q Okay. I wanted to ask you a question about it.

1 Now --

2 MR. TOPEL: Mr. -- for the record, that's Bureau  
3 Exhibit 412.

4 BY MR. COHEN:

5 Q Now you'll notice that the minutes reflect that Paul  
6 Crouch abstained from voting on several matters. Do you see  
7 that?

8 A Yes.

9 Q Okay. And did -- was it stated at the meeting why  
10 Paul Crouch abstained?

11 A No, sir.

12 Q Now you told me you had another meeting -- NMTV had  
13 another meeting in the summer.

14 A Yes.

15 Q Okay. I wanted to ask you who was president at that  
16 meeting? The summer meeting.

17 A Yes. It was Mrs. Jane Duff. In the same room with  
18 her was her, myself and Terry Hickey. And by telephone  
19 through the speaker phone which the bylaws say that we're  
20 allowed to do that --

21 Q Yes.

22 A -- and conduct legal business --

23 Q Yes.

24 A -- was Dr. Crouch and Dr. E. V. Hill.

25 Q Now did -- was there a vote taken at that meeting?



1           A     Yes.

2           Q     And did, did Dr. Crouch, Paul Crouch vote or did he

3 abstain?

4           A     I believe he abstained also.

5           Q     He abstained at that meeting at that --

6           A     I believe so.

7           Q     And he was on the telephone call. He was --

8           A     Yes.

9           Q     -- okay, he abstained. Okay. And did he state why

10 he abstained?

11          A     No, sir.

12          Q     Did anybody ask him?

13          A     Not that I remember, no.

14          Q     And as you sit here now, you don't know why Paul

15 Crouch abstained at the April 20, '93 meeting. Is that

16 correct?

17          A     No. But having served on many boards, that is a

18 prerogative of any person to abstain.

19          Q     Well, I'm not challenging his right to, to do it.

20          A     Oh.

21          Q     That's not my --

22          A     Okay.

23          Q     -- the thrust of my question. And if -- and I

24 didn't mean to suggest that. I'm just interested in, in you

25 had no knowledge as to why he abstained as you sit here today.

1 Am I correct?

2 A Correct.

3 Q It's never been told to you by anybody.

4 A No.

5 Q Was any business discussed at the, that summer  
6 meeting in 1993 other than the, the matter, matter concerning  
7 this hearing and the, the lawyers that you testified about?

8 A No, that was the topic of the meeting.

9 Q The sole topic.

10 A That's right.

11 Q Now I notice you said that Terry Hickey was  
12 president in person at the meeting in the summer.

13 A Yes, sir.

14 Q And what was Terry Hickey's role at that meeting?

15 A I assume he was there as an officer. And -- but he  
16 said nothing absolutely. Just sat there and listed.

17 Q Do you know -- did you ever ask anybody why he was  
18 present?

19 A Oh, no. He was an officer. I thought he had every  
20 right to be there.

21 Q Now was this a meeting of, was this a meeting of  
22 the, of the officers and directors of, of NMTV? Is that your  
23 understanding?

24 A No. My understanding was in an NMTV meeting.

25 Q Which would include officers.

1           A     Yes.

2           Q     Now does, does Mr. -- you told me earlier that Mr.

3 Hickey is an assistant secretary of NMTV.

4           A     Yes. sir.

5           Q     And do you have an understanding of what he does as

6 assistant secretary?

7           A     Very generally.

8           Q     Would you share that with --

9           A     To assist Mrs. Jane Duff.

10          Q     Would you share that with me?

11          A     Yes. I, I don't have specifics other than to say

12 that his role is to assist Mrs. Jane Duff.

13          Q     And do you have any knowledge as to how he assists

14 her?

15          A     No, I really don't know. I could not tell you

16 specific tasks that he's been given.

17          Q     And you've also testified earlier that Alan Brown is

18 an assistant secretary.

19          A     Yes, sir.

20          Q     Of NMTV. And do you know what, what Alan Brown's

21 responsibilities are?

22          A     Specifically no. But to carry out delegated duties

23 given to --

24          Q     And you don't know what those are.

25          A     No. Specifically I don't.

1 (Pause.)

2 Q Now I want to ask you a few questions about the,  
3 some of the financial aspects of, of the corporation. Do you  
4 know who's authorized to sign checks for NMTV?

5 A I know it's Mrs. Jane Duff. And I believe there has  
6 got to be two signatures. And I forget who is the other  
7 person or --

8 Q And do you know -- you say there has to be two  
9 signatures. Is that --

10 A I believe so.

11 Q -- is that a policy, an NMTV policy?

12 A I believe so.

13 Q And, and from whom or from what source did you learn  
14 that this was an NMTV policy?

15 A I think in the, in the papers. And I -- plus that  
16 we do it in my church, you know, to protect everybody, the  
17 institution and the people.

18 Q Are you assuming that that's the policy or do you --

19 A Yes, I'm sorry. Nebulous right there.

20 Q No, let me say to you, doctor, all I want is your  
21 best recollection --

22 A Yes, I, I --

23 Q And I'm not, I'm not trying to put words in your  
24 mouth. If you, if you can recall something --

25 A I think I do recall --

1 Q -- recall it. If you can't recall, tell me you  
2 can't recall.

3 A I think I recall it because I said gee, you know,  
4 how nice. Because this is -- this protects everybody.

5 Q And I take it you're not a -- you're not authorized  
6 to sign checks.

7 A No.

8 Q Do you know where -- do you know at what bank or  
9 banks NMTV has its accounts?

10 A I think it's Mitsubishi I think. But I can't  
11 recall.

12 Q Do you know how many bank accounts it has?

13 A No.

14 Q Now if you were asked to be a signatory on the  
15 account, would you be willing to do that?

16 A Most certainly.

17 Q And you haven't been asked.

18 A No.

19 Q Now you are aware, sir, because you've been in  
20 various organizations, you are aware that a non-profit  
21 corporation such as NMTV file tax returns with the State of  
22 California and with the IRS. You --

23 A Yes.

24 Q -- know that, don't you?

25 A Yes.

1 Q The tax -- the last tax return that NMTV filed with  
2 the State of California with the IRS was for what year if you  
3 know?

4 A I do not know. I would hope that we're up to date.

5 Q But you haven't received a copy of the, of the most  
6 recent state filing and federal filing.

7 A Not that I can remember.

8 Q Now the summer meeting that you attended, was, were  
9 minutes taken? We're talking now about the summer of 1993.  
10 Were minutes --

11 A I believe there were.

12 Q And who took the minutes?

13 A I believe Mrs. Jane Duff.

14 Q Have you received a copy of those minutes?

15 A Gee. I think I did. I, I can't remember. I --  
16 sorry. I --

17 Q You can't recall.

18 A -- can't recall. But I, I think I did see them.

19 Q You saw them. Where did you see them?

20 A I, I think I did receive them, receive them in the  
21 mail.

22 Q And were they signed when you received them, when  
23 you saw them?

24 A Yes, I -- again --

25 Q You're not -- you -- you're not clear at all on

1 this. Is that it?

2 A Yes. Correct.

3 Q Okay. I don't, I don't want you to guess or  
4 speculate. And if you don't recall something --

5 A I'm trying to pull --

6 Q Yeah.

7 A -- from my memory.

8 Q Sure.

9 A And --

10 Q Do you know the difference between reconstructing  
11 and recalling?

12 A Yes.

13 Q I -- what I don't want you to do is to reconstruct.  
14 If you don't recall, say I don't recall. And I'll ask you --

15 A Okay.

16 Q -- another question.

17 A All right.

18 Q So you really don't recall whether or not you  
19 received a copy of the minutes, is that --

20 A For certain, no.

21 Q Okay. Does anybody take charge of the minutes of  
22 NMTV? Keeps them, you know, in the file?

23 A Yes. Mrs. Jane Duff.

24 Q And, and what's your, your basis for, for stating  
25 that.

1 A Reviewing the documents.

2 Q If I told you that Mr. Norman Juggert was the person  
3 that kept the, the minute book of NMTV, would that be the  
4 first time you've heard that information?

5 A I've seen his name also there.

6 Q That's not my question. If I told you that he is  
7 the one that keeps the official minute book --

8 A Oh.

9 Q -- of NMTV, would that be the first time you have  
10 heard that?

11 A Yes.

12 (Pause.)

13 Q Is the name Ben Miller a name that's familiar to  
14 you?

15 A Yes, sir.

16 Q And tell me on what basis his name is familiar to  
17 you.

18 A I believe he is the chief engineer for TBN and has  
19 provided services for NMTV as well.

20 Q Now at the time your deposition was taken you didn't  
21 know that he provided services for NMTV. Am I correct?

22 A Right. I was not clear.

23 Q And you've been made clear on that point since the  
24 time your deposition --

25 A Yes.



1 Q And who made, who made, made it clear to you?

2 A In our conversations and as I have reviewed some of  
3 the documents.

4 Q Conversations with whom?

5 A Our lawyers.

6 Q And so now you know what you didn't know at the time  
7 of your deposition that Mr. Miller provides engineering  
8 services.

9 A That's right.

10 Q And do you know -- first of all, do you know what  
11 engineering services he provides to NMTV?

12 A I don't.

13 Q You just know he provides them.

14 A Yes.

15 Q And do you know is he compensated for the services  
16 he provides?

17 A I do not know. But I would hope so.

18 Q No one ever told you whether he was or he wasn't.

19 A No.

20 Q Okay. And if he is compensated you don't know on  
21 what basis, do you?

22 A No, I don't.

23 Q Do you, do you have any, any knowledge as you sit  
24 here today of, of what engineering services are provided by  
25 TBN to NMTV?